# EXHIBIT 11

# Version with confidentiality designations removed of Dkt. 1115-21

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**UNITED STATES DISTRICT COURT**
**NORTHERN DISTRICT OF CALIFORNIA**

21

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER

22

CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all other similarly

23

situated,

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Plaintiffs,

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v.

GOOGLE LLC,

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Defendant.

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Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF CHRISTOPHER
THOMPSON ISO PLAINTIFFS' MOTION
FOR AN AWARD OF ATTORNEYS'
FEES, COSTS, AND SERVICE AWARDS**

Judge: Hon. Yvonne Gonzalez Rogers
Date: August 7, 2024
Time:  2:30 p.m.
Location: Courtroom 1 – 4th Floor

1          **DECLARATION OF CHRISTOPHER THOMPSON**

2          I, Christopher Thompson, declare as follows:

3          1.      Counsel for the *Brown* Plaintiffs retained me to provide technical analysis and

4    forensics throughout the full life of the case, and for work in connection with the Plaintiffs'

5    Motion for an Award of Fees, Costs, and Service Awards (the "Motion").

6          2.      All of the statements in this declaration are true based on my analysis and personal

7    knowledge, and, if the Court permits it, I am available and willing to testify on these matters

8    during the upcoming hearing on the Motion.

9          3.      A true and correct copy of my CV is attached as **Exhibit 1**. As reflected in my

10   CV, I majored in Computer Engineering and have many years of experience in computing

11   technology. I am being compensated at a rate of $275 per hour for my work in connection with

12   this matter, and none of my compensation is contingent on the outcome of this litigation.

13         4.      As a result of my work on this case, I have become familiar with Google's data

14   collection, usage, and storage practices. Since the inception of this litigation, I have personally

15   worked on the data collection and analysis from the data sources at issue in the case, in

16   coordination with Plaintiffs' counsel. I previously provided four expert technical declarations

17   and statements to this Court for this case, which have been filed at Dkt. 535-18 (April 11, 2022),

18   Dkt. 834-2 (January 20, 2023), Dkt. 656-1 (August 4, 2022), and Dkt. 1097-16 (April 1, 2024).

19   Each declaration relates to Google's data collection, structure, and storage practices. Magistrate

20   Judge Susan Van Keulen allowed me to provide live expert testimony during one of the Sanctions

21   Hearings. *See* Dk. 554. I was also actively involved in advising on the technical aspects of the

22   parties' settlement and submitted a declaration informing this Court on the data sources at issue

23   in the settlement and the steps Google committed to undertake to delete and remediate the at-

24   issue data. Dkt. 1097-16.

25         5.      Based on my professional experience and first-hand knowledge of Google's data

26   collection and storage practices, it is my opinion that Google can readily use the X-Client-Data

27   Header ("XCDH") or Incognito detection bits, combined with the IP address and user agent along

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     Thompson Decl. ISO Plaintiffs' Motion for an Award              4:20-cv-03664-YGR-SVK
     of Attorneys' Fees, Costs, and Service Awards

1    with other stored data in a certain log, to identify the same events stored in other Google logs.

2    Once those same events are identified, one may then remediate or delete those corresponding

3    events. *See* Hochman Report (Dkt. 643-8) ¶ 32; Hochman Rebuttal Report (Dkt. 643-9) ¶¶ 29–

4    30, 36, 52. I believe that this approach, if undertaken, would only affect between 3% and 15% of

5    the total events across remaining Google data sources which do not contain an XCDH or an

6    Incognito detection bit. Along with Plaintiffs' expert Mr. Jonathan Hochman, I also determined

7    that one may identify Incognito events by using User Metrics Analysis ("UMA") IDs from

8    Chrome logs together with Chrome histogram events to cross reference those events against other

9    data sources identified by Special Master Brush. *See id.* ¶¶ 255–58. Herein I refer to these two

10   approaches as "search and destroy" approaches, because they would involve Google individually

11   identifying and either deleting or otherwise remediating at-issue data.

12           6.      As I detailed in my Declaration in support of Plaintiffs' Unopposed Motion for

13   Final Approval of Class Action Settlement (Dkt. 1097-16), Google committed to undertake a

14   wholesale deletion of certain data (including but not limited to private browsing data) and

15   remediation of other data (also including, but not limited to, private browsing data), rather than

16   engage in a "search and destroy" approach. The wholesale approach the parties agreed to

17   addressed concerns about any supposed "error rate" that may have occurred had Google engaged

18   in the "search and destroy" approach of the at-issue data. *See* Psounis Rebuttal Report (Dkt. 659-

19   10) ¶¶ 109–10.

20           7.      During my work on this case, I was also directly involved in conducting initial

21   tests on the data utilized by Google Ad Manager. During those tests, we found that Google

22   Analytics shares data with Google Ad Manager, and Google's Analytics data collection during

23   private browsing is sent to Google Ad Manager's domain, then propagated directly into Ad

24   Manager logs. *See* Hochman Report (Dkt.643-8) ¶¶ 218 (citing GOOG-CABR-05404845, at -

25   855). Although Google labeled many such logs "Ad Manager" logs, at least part of the data from

26   those logs came from Google Analytics, which includes the data at issue in this case.

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Thompson Decl. ISO Plaintiffs' Motion for an Award            4:20-cv-03664-YGR-SVK
of Attorneys' Fees, Costs, and Service Awards

1       8.     I declare under penalty of perjury under the laws of the United States of America

2  that the foregoing is true and correct. Executed this 21st day of June, 2024, at Nolensville,

3  Tennessee.

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5                                       */s/ Christopher Thompson*
                                          Christopher Thompson

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Thompson Decl. ISO Plaintiffs' Motion for an Award          4:20-cv-03664-YGR-SVK
of Attorneys' Fees, Costs, and Service Awards

# Exhibit 1 to Declaration of Christopher Thompson ISO Plaintiffs' Motion for an Award of Attorneys' Fees, Costs, and Service Awards

# Christopher Thompson

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Nolensville, TN 37135
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|---|---|
| **Education** | **Vanderbilt University** Nashville, Tennessee   *Bachelor of Engineering May 2010*<br>Major: Computer Engineering<br>Minor: Engineering Management (School of Engineering) |
| **Publications** | **Journal Publications** |

**Journal Publications**

Jules White, Chris Thompson, Hamilton Turner, Brian Dougherty, Douglas C. Schmidt, WreckWatch: Automatic Traffic Accident Detection and Notification with Smartphones, Springer Journal of Mobile Applications and Networks

Jules White, Sibohan Clarke, Brian Dougherty, Chris Thompson, Douglas C. Schmidt, R&D Challenges and Solutions for Mobile Cyber-Physical Applications and Supporting Internet Services, Springer Journal of Internet Services and Applications

Jules White, Brian Dougherty, Chris Thompson, Douglas C. Schmidt, "ScatterD: Spatial Deployment Optimization with Hybrid Heuristic / Evolutionary Algorithms," ACM Transactions on Autonomous and Adaptive Systems Special Issue on Spatial Computing.

**Conference Publications**

Chris Thompson, Hamilton Turner, Jules White, and Douglas C. Schmidt, Analyzing Mobile Application Software Power Consumption via Model-Driven Engineering, Proceedings of the 1st International Conference on Pervasive and Embedded Computing and Communication Systems, Algarve, Portugal, March 5-7, 2011. **Received Best Student Paper Award**

Chris Thompson, Jules White, and Douglas C. Schmidt, Analyzing Mobile Application Software Power Consumption via Model-Driven Engineering, ACM/IEEE 13th International Conference on Model Driven Engineering Languages and Systems, October 3-8, 2010 Oslo, Norway

Chris Thompson, Jules White, Brian Dougherty and Douglas C. Schmidt, Using Smartphones to Detect Car Accidents and Provide Situational Awareness to Emergency Responders, MobilWare 2010, June 28 – July 2, 2010, Chicago, IL USA. **Best Paper Recipient**

Brian Dougherty, Jules White, Jaiganesh Balasubramanian, Chris Thompson, and Douglas C. Schmidt, Deployment Automation with BLITZ, 31st International Conference on Software Engineering, May 16-24, 2009 Vancouver, Canada.

Brian Dougherty, Jules White, Chris Thompson, and Douglas C. Schmidt, Automating Hardware and Software Evolution Analysis, 16th Annual IEEE International Conference and Workshop on the Engineering of Computer Based Systems (ECBS), April 13-16, 2009 San Francisco, CA USA.

**Workshop Publications**

Chris Thompson, Jules White, Brian Dougherty, and Douglas C. Schmidt, Optimizing Mobile Application Performance with Model-Driven Engineering, The Seventh Annual IFIP Workshop on Software Technologies for Future Embedded and Ubiquitous Systems, November 16-18, 2009 Newport Beach, California

**Book Chapters**

Hamilton Turner, Jules White, Chris Thompson, Krzysztof Zienkiewicz, Scott Campbell, Douglas C. Schmidt, Building Mobile Sensor Networks Using Smartphones and Web Services: Ramifications and Development Challenges, *Handbook of Research on Mobility and Computing: Evolving Technologies and Ubiquitous Impacts*, edited by Maria Manuela Cruz-Cunha and Fernando Moreira, IGI Global, Hershey, PA, USA 2009 (Accepted Proposal)

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|---|---|
| **Patents** | **Issued**<br>8,907,772: *System and method for automatic unsafe driving determination and notification*<br>9,578,445: *Systems and methods to synchronize data to a mobile device based on a device usage context*<br>9,363,670: *Systems and methods for restricting access to network resources via in-location access point protocol*<br>9,773,107: *Systems and methods for enforcing security in mobile computing* |
| **Testimony** | September 2021, submitted an expert report/provided testimony on behalf of Ravgen Inc. in<br>      Ravgen Inc. v. Natera, Inc.<br>       Western District of Texas; Case No. 6:20-cv-451<br><br>April 2022, submitted declarations and provided testimony on behalf of Brown et. al. in Brown et.<br>      al. v. Google, LLC et. al<br>       Northern District of California; Case No. 20-CV-03664-LHK<br><br>June 2023, submitted an expert report/provided testimony on behalf of Guardant Health in<br>      Guardant Health in Twinstrand Biosciences Inc., & University of Washington v. Guardant<br>      Health<br>      District of Delaware; Case No 1:21-cv-01126-LPS<br><br>September 2023, submitted an expert report/provided testimony on behalf of Ravgen Inc. in<br>      Ravgen Inc. v. Natera, Inc.<br>       Western District of Texas; Case No. 6:20-cv-451<br><br>January 2024, provided testimony in court on behalf of Ravgen Inc. in Ravgen Inc. v. Natera, Inc.<br>       Western District of Texas; Case No. 6:20-cv-451<br><br>March 2024, submitted an expert report/provided testimony on behalf of Ravgen Inc. in Ravgen<br>      Inc. v. Ariosa Diagnostics Roche Sequencing Solutions, Inc., Roche Molecular Systems,<br>      Inc., and Foundation Medicine, Inc<br>      District of Delaware; Case No. 20-cv-1646-RGA-JLH<br><br>March 2024, submitted an expert report/provided testimony on behalf of IBM in International<br>      Business Machines v. Zynga, Inc<br>      District of Delaware; Case No. 1:22-cv-00590 |
| **Technology Consulting and Experience (ongoing)** | **Firebolt Group** Wixom, MI<br>*Chief Technology Officer* July 2022 – Present<br>  • Responsible for overseeing new technology initiatives and software development<br>  • Engaged to provide leadership and structure for early-stage CV and analytics technology acquisition<br>  • Onboarded and grew multinational development and operations team<br><br>**NewsBreak Media Networks** Nashville, Tennessee<br>*Chief Technology Officer* January 2015 – Present<br>  • Responsible for ground-up architecture of marketing automation tools for brick and mortar, convenience retail<br>  • Designed and built critical software components and infrastructure for video distribution to remote and distributed player software<br>  • Tasked with defining and implementing the product roadmap and technology vision |

**JMG Marketing**
*Technology Strategy Consultant and Developer* March 2021 - Present
- Provided development resources for print and business process automation

**Vanderbilt University**
*Technology Strategy Consultant and Developer* January 2018 – Present
- Research IT consulting and software development for research-related projects.

**Vanderbilt University Medical Center**
*Technology Strategy Consultant and Developer* January 2019 – Present
- Research IT consulting and software development for research-related projects. Entity separated from Vanderbilt University.

**University of Kentucky**
*Technology Strategy Consultant and Developer* August 2020 – Present
- Research IT consulting and software development for research-related projects.

**233 Analytics, LLC**
*Consultant* April 2010 - Present
- Provided development resources for custom enterprise applications and mobile applications along with consulting expert services for software patent litigation.

**Technology Consulting and Experience (historical)**

**Macy's Department Stores**
*Third-party software developer* June 2013 – August 2022
- Software development services for back-office automation of loss prevention division.

**Braze, Inc**
*Third-party software developer* May 2019 – December 2021
- Developed a mobile application to support developer and user events demonstrating the Braze user-engagement platform.

**Savantis Solutions**
*Technology Strategy Consultant* September 2019 – December 2019
- Provided technology and software development process guidance for custom product development pertaining to point of sale and e-commerce systems

**TalentWell, LLC**
*Technology Strategy Consultant* January 2018 – December 2019
- Provided CTO and technology strategy services for the professional development space.

**Nationwide Studios** Nashville, Tennessee
*Chief Product Officer* December 2017 – November 2018
- Responsible for overseeing development and architecture of photography capture and commerce products
- Designed and implemented data analytics platform to leverage historical customer data to increase product efficacy
- Managed migration of legacy back office systems to modern architectures to increase efficiency and agility

**WellPath**
*Third-party software developer* January 2017 – August 2019
- Provided mobile app development and data analytics services for the prison healthcare space.

**Nationwide Studios, Inc**

*Chief Product Officer* June 2017 – November 2018
- Responsible for overseeing development and architecture of photography capture and commerce products
- Designed and implemented data analytics platform to leverage historical customer data to increase product efficacy
- Managed migration of legacy back office systems to modern architectures to increase efficiency and agility

**OptioLabs, LLC** Nashville, Tennessee
*Senior Software Development Consultant* March 2012 – December 2015
- Worked on numerous projects including a secure Android middleware layer, command and control systems for remote devices, custom data analytics packages and other business services
- Architected and managed cloud computing resources including EC2 instances and infrastructure
- Automated deployment and testing frameworks

**Cyber Physical Systems, Inc.** Nashville, Tennessee
*Founder & CEO* May 2010 – May 2013
- Raised over $2.1m in venture funding for consumer electronic startup
- Architected and implemented command and control server for distributed network of devices
- Managed product development cycle to bring concept to physical product
- Featured in Engadget, TechCrunch, VentureBeat, FoxNews.com among others

**Institute for Software Integrated Systems** Vanderbilt University, Nashville, Tennessee
*Undergraduate Research Assistant* Summer 2009
- Constructed 4 mobile applications based on the Android platform
- Conducted research on mobile performance analysis and power-consumption optimization
- Presented findings and projects to upper-level administrators within the School of Engineering and Vanderbilt University.

**Litigation Consulting (ongoing)**

Consultant to The State of Texas in The State of Texas v. Google, LLC
    Texas State, Victoria County, 377th District Court; Case 22-01-88230-D
    March 2024 - Present

Consultant to IBM in Pardalis Tech. v. IBM
    Eastern District of Texas; Case 2:22-cv-00452-JRG-RSP
    February 2024 - Present

Consultant to X Corp. in VidStream LLC v. Twitter Inc.
    Northern District of Texas; Case 3:16-CV-0764-N
    January 2024 – Present
    Case pertains to web technology and video capture.

Consultant to X Corp. in B.E. Tech LLC v. Twitter Inc.
    District of Delaware; Case 20-CV-621
    January 2024 – Present
    Case pertains to digital advertising.

Consultant to ViaSat in prelitigation matter pertaining to CDN technologies.
    December 2023 – Present

Consultant to Multimedia Technologies Pte Ltd. in Multimedia Technologies Pte Ltd. v. Vizio,
Inc
Eastern District of Texas; Case 2:23-CV-00124-JRG-RSP
October 2023 – Present
Case pertains to television user interfaces.

Consultant to Multimedia Technologies Pte Ltd. in Multimedia Technologies Pte Ltd. v. LG
Electronics, Inc
Eastern District of Texas; Case 2:22-CV-00494-JRG-RSP
October 2023 – Present
Case pertains to television user interfaces.

Consultant to OBM, Inc. in OBM, Inc. v. Lancium
Southern District of Texas; Case 4:23-cv-1798
September 2023 – Present
Case pertains to industrial power management technology.

Consultant to Ravgen Inc. in Ravgen Inc. v. Ariosa Diagnostics Roche Sequencing Solutions, Inc.,
Roche Molecular Systems, Inc., and Foundation Medicine, Inc
District of Delaware; Case  No. 20-cv-1646-RGA-JLH
July 2023 – Present
Case pertains to noninvasive prenatal testing

Consultant to Motorola Solutions Inc in STA Group LLC v. Motorola Solutions, Inc.
Eastern District of Texas; Case 2:22-CV-00381
July 2023 – Present
Case pertains to radio and communication technology.

Consultant to Genius Media Group, Inc in In re Google Digital Publisher Antitrust Litigation
Northern District of California; Case 20-08984
Southern District of New York; Case 21-03010
January 2023 – Present
Case pertains to anticompetitive behavior and advertising technology.

Consultant to VL Collective IP, LLC in Starz Entertainment, LLC v. VL Collective IP, LLC, et al.
District of Delaware; Case 21-cv-01448-JLH
December 2022 – Present
Case pertains to adaptive bitrate streaming technologies.

Consultant to Guardant Health in Twinstrand Biosciences Inc., & University of Washington v.
Guardant Health
District of Delaware; Case No 1:21-cv-01126-LPS
November 2022 – Present
Case pertains to genomic analysis.

Consultant to Apple in AliveCor v. Apple
Northern District of California; Case No 4:21-cv-03958
July 2022 – Present
Case pertains to heart rate monitoring via wearable technology.

Consultant to Disney in matter involving streaming technologies.
June 2022 – Present

Consultant to Reichman Jorgensen Lehman & Feldberg LLP in matter pertaining storage
technologies
August 2022 - Present

Consultant to Hewlett Packard Enterprise Company in Intellectual Ventures I LLC and Intellectual
    Ventures II LLC v. Hewlett Packard Enterprise Company
    Western District of Texas; Case Nos. 6:21-cv-226-ADA, 6:21-cv-596-ADA, and 6:21-cv-
    1298-ADA
    May 2022 – Present
    Case pertains to distributed storage technologies.

Consultant to IBM in International Business Machines v. Zynga, Inc
    District of Delaware; Case No. 1:22-cv-00590
    January 2022 – Present
    Case pertains to web technology.

Consultant to Motorola Mobility LLC in Sonrai Memory Technologies v. Motorola Mobility LLC
    ITC; Case No. 337-TA-1280
    December 2021 – Present
    Case pertains to battery optimization strategies.

Consultant to Avia Games in Skillz Platform, Inc v. Avia Games, Inc
    Northern District of California; Case No. 5:21-cv-02436
    October 2021 – Present
    Case pertains to mobile gaming platforms.

Consultant to TrackThings LLC in TrackThings LLC v. Amazon Inc.
    Western District of Texas; Case No. 6:21-cv-00720
    August 2021 – Present
    Case pertains to mesh networking technology.

Consultant to TrackThings LLC in TrackThings LLC v. Netgear, Inc.
    District of Delaware; Case No. 1:22-cv-00981
    August 2021 – Present
    Case pertains to mesh networking technology.

Consultant to Ravgen Inc. in Ravgen Inc. v. Natera, Inc.
    Western District of Texas; Case No. 6:20-cv-451
    June 2021 – Present
    Case pertains to genetic analysis.

Consultant to IBM in International Business Machines Corporation v. Rakuten, Inc. et al.
    District of Delaware; Case No. 1:21-cv-00461-LPS
    April 2021 – Present
    Case pertains to web technologies.

Consultant to IBM in Chewy, Inc. v. International Business Machines Corporation,
    Southern District of New York; Case No. 1:21-cv-01319-JSR
    April 2021 – Present
    Case pertains to web technologies.

Consultant to Carr et. al. in Carr et. al. v. Google LLC
    Northern District of California; Case No. 5:20-cv-05761
    March 2021 – Present
    Case pertains to anticompetitive behavior in the mobile application market.

Consultant to Csupo et. al. in Csupo et. al. v. Google LLC
    Central District of California; Case No. 19-cv-352557,
    March 2021 – Present

Case pertains to conversion of cellular data.

Consultant to Rodriguez, et. Al.  in Rodriguez et. al. v. Google LLC
  Northern District of California; Case No. 3:20-cv-04688-RS
  September 2020 – Present
  Case pertains to undisclosed tracking of user behavior.

Consultant to Brown, et. Al.  in Brown et. al. v. Google LLC
  Northern District of California; Case No. 5:20-cv-03664-LHK
  August 2020 – Present
  Case pertains to undisclosed tracking of user behavior.

Consultant to Droplets Inc in Droplets, Inc. v. Yahoo! Inc.
  Northern District of California; Case No. 12-cv-3733
  July 2020 – Present
  Matter pertains to internet and web design technologies.

Consultant to Polaris PowerLED Technologies in Polaris PowerLED Technologies v. LG
Electronics, Inc
  Central District of California; Case No. 8:20-cv-00125-JVS-DFM
  July 2020 – Present
  Matter pertains to automatic brightness control in digital displays.

Consultant to IBM in IBM v. Zillow
  Western District of Washington, Case No. 2-20-cv-01130
  January 2020 – Present
  Case pertains to web technologies.

Consultant to IBM in IBM v. Zillow
  Western District of Washington, Case No. 2-20-cv-00851
  January 2020 – Present
  Case pertains to web technologies.

Consultant to MLB Advanced Media in Sport Vision v. MLB Advanced Media LP
  Southern District of New York, Case No. 1:18-cv-03025
  November 2018 – Present
  Case pertains to baseball data and video analysis.

**Litigation Consulting (historical)**

Consultant to Vector Flow, Inc in HID Global Corporation v. Vector Flow, Inc.
  District of Delaware, Case 1:21-cv-01769
  April 2023 – January 2024

Consultant to OnPoint Systems, LLC in OnPoint Systems, LLC v. Protect Animals With Satellites
  LLC
  Eastern District of Texas; Case No. 20-657-ALM
  October 2021 – January 2024
  Case pertains to GIS and pet tracking solutions.

Consultant to Grant and Eisenhofer PA in regulatory matter
  May 2022 – August 2022

Consultant to SpaceTime 3D in SpaceTime 3D v. LG Electronics
  Eastern District of Texas; Case No 2:22-cv-00049-RWS
  November 2022 – April 2023
  Base pertains to brightness control in digital displays.

Consultant to Honeywell International Inc in Honeywell International Inc. v. Zebra Technologies Corporation
>    Western District of Texas; Case No. 6:21-CV-01008
>    February 2022 – July 2022
>    Case pertains to barcode scanning technology.

Consultant to Apple Inc, in KOSS Corporation v. Apple, Inc.
>    Western District of Texas; Case No. 6:20-cv-00665
>    September 2021 – November 2022
>    Case pertains to digital audio and wireless headphone technology.

Consultant to T-Mobile USA, Inc in AGIS Software Development, LLC v. T-Mobile USA, Inc.
>    Eastern District of Texas; Case No. 2:21-cv-00072
>    September 2021 – November 2021
>    Case pertains to digital audio and wireless headphone technology.

Consultant to Lyft, Inc in AGIS Software Development, LLC v. Lyft, Inc.
>    Eastern District of Texas; Case No. 2:21-cv-00024
>    September 2021 – November 2021
>    Case pertains to GIS and location tracking.

Consultant to Uber Technologies, Inc in AGIS Software Development, LLC v. Uber Technologies, Inc.
>    Eastern District of Texas; Case No. 2:21-cv-00026
>    September 2021 – November 2021
>    Case pertains to GIS and location tracking.


Consultant to the State of Arizona in State of Arizona v. Google, LLC
>    Maricopa Superior Court; Case No. CV2020-006219
>    June 2021 – October 2022
>    Case pertains to mobile device location tracking.

Consultant to Dropbox, Inc in Dropbox. Inc v. Motion Offense, LLC
>    Western District of Texas; Case No. 6:20-cv-00251-ADA
>    June 2021 – May 2023
>    Case pertains to file synchronization.

Consultant to Dropbox, Inc in Justservice.net LLC v. Dropbox. Inc
>    Western District of Texas; Case No. 6:20-cv-00070-ADA
>    June 2021 – June 2022
>    Case pertains to file synchronization.

Consultant to NetApp in Proven Networks v. NetApp
>    Western District of Texas; Case No. 6:20-cv-00369
>    May 2021 – October 2022
>    Case pertains to distributed storage technologies.

Consultant to G Holdings in G Holdings v. Samsung
>    Eastern District of Texas; Case No. 2:20-cv-00342
>    May 2021 – August 2021
>    Case pertains to mobile payment technologies.

Consultant to KinectUs LLC in KinectUs LLC v. Bumble Trading LLC
>    Western District of Texas; Case No. 6:20-CV-00942
>    April 2021 – January 2022

Case pertains to social networking technologies.

Consultant to Gigamon in Gigamon, Inc. v. Apcon, Inc.
Eastern District of Texas; Case No. 2:19-cv-00300
December 2019 – April 2021
Matter pertains to packet broker technologies
Case pertains to network monitoring technologies.

Consultant to IBM in IBM v. Airbnb Inc.
District of Delaware; Case No. 20-351-LPS
August 2020 – December 2020
Matter pertains to internet and web design technologies

Consultant to Droplets Inc in Droplets, Inc. v. Nordstrom Inc.
Northern District of California; Case No. 12-cv-04049
July 2020 – April 2022
Matter pertains to internet and web design technologies

Consultant to Spacetime 3D, Inc in Spacetime 3D, Inc v Samsung Electronics America, Inc.
Eastern District of Texas; Case No. 2:19-cv-00372-JRG
June 2020 – March 2021
Matter pertains to human computer interaction technologies

Consultant to Sound View Innovations in Sound View Innovations v Delta Airlines, Inc
District of Delaware; Case No. 1:19-cv-00659-CFC-CJB
December 2019 – October 2020
Matter pertains to data processing at scale

Consultant to Sound View Innovations in Sound View Innovations v Cigna Corporation
District of Delaware; Case No. 1:19-cv-00964-CFC-CJB
December 2019 – October 2020
Matter pertains to data processing at scale

Consultant to Sound View Innovations in Sound View Innovations v CBS Interactive, Inc
District of Delaware; Case No. 1:19-cv-00146-CFC-CJB
December 2019 – June 2020
Matter pertains to data processing at scale and streaming media

Consultant to MV3 Partners in MV3 Partners LLC v. Roku, Inc.
Western District of Texas; Case No. 6:18-cv-00308
August 2019 – October 2020
Matter pertains to streaming media technologies

Consultant to Apple, Inc in IXI Mobile v. Apple, Inc.
Southern District of New York; Case No. 4:15-cv-03755
June 2019 – January 2020
Matter pertains to mobile application design

Consultant to Polaris PowerLED Technologies in Polaris PowerLED Technologies LLC v Vizio, Inc
Central District of California; Case No. 8:18-cv-01571
June 2019 – Present
Matter pertains to automatic brightness control in digital displays

Consultant to Apple Inc in VoIP-Pal v. Apple
Northern District of California, Case No. 5:18-cv-06216

March 2019 – October 2020
Matter pertains to digital telephony

Consultant to Kroy IP Holdings, LLC in Kroy IP Holdings, LLC v. Groupon, Inc.
    District of Delaware, Case No. 1 : 17-cv-01405
    February 2019 – June 2020
    Matter pertains to digital couponing

Consultant to Deluxe Corp in confidential matter pertaining to ACH and payment processing
    December 2018 – March 2019

Consultant to C3 IoT in Blattman et al. v. Siebel et al.
    District of Delaware, Case No. 1:15-cv-00530
    October 2018 – February 2020
    Non-patent contract dispute

Consultant to Polaris PowerLED Technologies in Polaris PowerLED Technologies, LLC v.
    Samsung Electronics America, Inc.
    Eastern District of Texas, Case No. 2:17-cv-00715
    April 2018 – June 2019
    Matter pertains to automatic brightness control in digital displays

Consultant to Apple Inc. in AGIS Software Development LLC v. Apple Inc.
    Eastern District of Texas, Case No. 2:17-cv-00516
    March 2018 – January 2019
    Matter pertains to geospatial software and mobile applications

Consultant to IBM in IBM v Expedia, INC
    District of Delaware, Case No. 1:17-cv-01875-UNA
    December 2017 – September 2019
    Matter pertains to internet and web design technologies

Consultant to Velocity Patent LLC vs FCA US LLC
    Northern District of Illinois, Case No. 1:13-cv-08419
    May 2017 – June 2019
    Matter pertains to automotive control software

Consultant to Apple Inc. in Nokia Technologies Oy & Alcatel-Lucent USA Inv. v. Apple Inc.
    Eastern District of Texas, Case Nos. 2:16-cv-1440 and 2:16-cv-1441
    March 2017 – October 2017
    Matter pertains to baseband processing and LTE technologies

Consultant to Koninklijke Philips N.V. in Koninklijke Philips N.V. v. Acer, ASUSTeK, Double
    Power Tech, HTC Corp, Southern Telecom, Visual Land and YiFang USA
    US District Court for the District of Delaware, Case Nos. 15-1170-GMS, 15-1125-GMS,
    15-1130-GMS, 15-1126-GMS, 15-1128-GMS, 15-1127-GMS, 15-1131-GMS
    January 2017 – October 2020
    Matter pertains to touch screen interfaces and gesture detection

Consultant to IBM in IBM v. Groupon
    US District Court for the District of Delaware, Case No. 1:16-cv-00122
    December 2016 – December 2018
    Matter pertains to web technologies

Consultant to IBM in confidential contractual matter
    July 2016 – July 2019

Matter pertained to terms of software development/implementation contract and outcomes of project.

Consultant to IBM in IBM v. Priceline Group
        US District Court for the District of Delaware, Case No. 1:15-cv-00137
        July 2016 – January 2018
        Matter pertains to internet and web design technologies

Consultant to Oracle Inc. in Oracle v. Google
        Northern District of California, Case No. 3:10-cv-03561-WHA
        December 2015 – June 2019
        Non-patent copyright matter

Consultant to Apple Inc. in Core Wireless v. Apple Inc.
        Eastern District of Texas, Case No. 6:14-cv-00752-JRG-JDL
        May 2015 – December 2016
        Matter pertains to mobile applications and cloud technologies

Consultant to Apple Inc. in Ericsson v. Apple Inc.
        Eastern District of Texas, Case No. 2:15-cv-00017-JRG-RSP
        May 2015 – April 2016
        Case pertained to cellular communications protocols and standards

Consultant to Apple Inc. in Ericsson v. Apple Inc.
        International Trade Commission, ITC Investigation 337-TA-953
        May 2015 – April 2016
        Case pertained to cellular communications protocols and standards

Consultant to Apple Inc. in Ericsson v. Apple Inc.
        Northern District of California, Case No. 15-CV-00154-JD
        May 2015 – April 2016
        Case pertained to cellular communications protocols and standards

Consultant to Apple Inc. in Dragon Intellectual Property v. Apple Inc.
        Delaware District Court, Case No. 1:13-cv-02058
        March 2015 – June 2015
        Case pertained to media playback and recording

Consultant to Apple Inc. in Cellular Communications Equipment v. Apple Inc.
        Eastern District of Texas, Case No. 6:14-cv-00031
        July 2014 – June 2015
        Case pertained to low level baseband processing and cellular communication

Consultant to Apple Inc. in Unwired Planet v. Apple Inc.
        Northern District of California, Case No. 13-cv-04134-VC
        November 2014 – January 2015
        Case pertained to cloud computing technologies.

Consultant, Confidential Matter pertaining to mobile operating systems
        October 2014 – June 2015

Consultant, Confidential Matter pertaining to networking technologies and streaming media
        August 2014 – December 2014

Consultant to InfoSpan Inc. in InfoSpan v. Emirates NBD Bank PJSC
        Central District of California, Case No. 8:2014-cv-01679

October 2013 – July 2015
Case pertained to trade secrets involving mobile banking technologies

Consultant to TLI Communications in TLI Communications v. Snapchat
    District of Delaware, Case No. 1:13-cv-01931
    December 2014 – August 2015
    Case pertained to web technologies.

Consultant to TLI Communications in TLI Communications v. Imgur
    District of Delaware, Case No. 1:13-cv-01926
    December 2014 – August 2015
    Case pertained to web technologies.

Consultant to TLI Communications in TLI Communications v. Shutterfly
    Eastern District of Virginia, Case No. 1:14-cv-00788
    December 2014 – August 2015
    Case pertained to web technologies.

Consultant to TLI Communications in TLI Communications v. Dropbox
    Eastern District of Virginia, Case No. 1:2014cv00781
    December 2014 – August 2015
    Case pertained to web technologies.

Consultant to Apple Inc. in Intertrust Technologies Corp. v. Apple
    Inc., Northern District of California, Case No. 4:13-cv-1235
    October 2013 – April 2014
    Case pertained to distribution of mobile content, such as music and apps.

Consultant to Apple Inc. in PersonalWeb et. al. v Apple
    Eastern District of Texas, Case No. 6:12-cv-00660
    July 2013 – March 2014
    Case pertained to cloud computing technologies.

Consultant to Apple Inc. in EPL Holdings v. Apple
    Northern District of California, Case No. 5:12-cv-04306-HRL
    July 2013 – December 2014
    Case pertained to audio processing technologies.

Consultant to Apple Inc. in FlatWorld Interactives LLC v. Apple
    Northern District of California, Case No. 3:12-cv-01956
    April 2013 – December 2014
    Case pertained to multitouch input processing.

Consultant to Collarity Inc. in Collarity v. Google
    Delaware District Court, Case No. 1:11-cv-01103-MPT
    November 2012 – February 2013
    Case pertained to web search technologies.

Consultant to Apple Inc. in Apple v. Samsung
    Northern District of California, Case No. 5:12-cv-00630-LHK
    August 2012 – March 2014
    Case pertained to mobile operating systems and mobile user interfaces

Consultant to Apple Inc. in Apple v. Motorola Mobility. Inc.
    Southern District of Florida, Case No. 1:12-cv-20271
    April 2012 – June 2014

Case pertained to mobile operating systems and mobile user interfaces

Consultant to Apple Inc. in Apple v. Samsung
       Northern District of California, Case No. 5:11-cv-01846-LHK
       August 2011 – February 2012
       Case pertained to mobile operating systems and mobile user interfaces

Consultant to General Growth Properties in NorthMobile Tech v. General Growth Properties
       Western District of Wisconsin, Case No. 3:11-cv-00291
       May 2011 – September 2011
       Case pertained to mobile distribution of advertisements.

Consultant, Confidential Matter, May 2011 – May 2011 pertaining to mobile operating systems.

Consultant to Apple Inc. in Apple v. HTC
       Delaware District Court, Court No. 1:10-cv-00166-RK
       May 2010– May 2011
       Case pertained to mobile operating systems and mobile user interfaces

Consultant to Apple Inc. in Apple v. HTC
       International Trade Commission, ITC Investigation 337-TA-710
       May 2010 – May 2011
       Case pertained to mobile operating systems and mobile user interfaces